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In re Policing - Follow Up on Dkt No. 780 Conferrals

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Wed, Jan 18, 2023 at 2:34 PM

To: "Braun, Daniel (Law)" <dbraun@law.nyc.gov>, NYC Law Protest Team <NYCLawProtestTeam@law.nyc.gov>

Cc: AG-NYPDLitigation <AG.NYPDLitigation@ag.ny.gov>, Gray Legal Team-External <GrayLegalTeam@dwt.com>, Payne Litigation Team <PayneLitigationTeam@nyclu.org>, Hernandez Team <hernandez@femmelow.com>, Sow-Legal <Sow-Legal@blhny.com>, "rolonlegalteam ." <rolonlegalteam@aboushi.com>

Hi Daniel et al.,

As discussed yesterday, below is the kind of information we would like to know about the EIC's document and data storage -- and what we think we need to know to evaluate the City's claim of burden as to those documents (so that you can give us your position on whether you're refusing to provide this information).

These are intended to be representative -- not exhaustive, or limiting -- since answers to these question could and likely will lead to the need to ask follow ups.

We think understanding the claim of burden requires us to know, among other things:

- How does the NYPD collect and store the information that it reports in its quarterly reports about EIS referrals?
- How, and in what format, does the NYPD share information about EIS referrals to the Early Intervention Committee?
- Does the NYPD maintain a database to allow it to track outcomes of EIS referrals? If not, how does it track those outcomes, as it has reported to City Council that it does?
- Can the NYPD isolate EIC documentation according to which of the court-ordered EIS referral thresholds triggered the referral?
- Are documents and other information collected by the EIC in a text-searchable format? If not, is OCRing the documents something that could be automated? How much time would setting that up take?
- How many total EIS referrals took place in the period the City believes is likely to contain Schedule A protest related referrals? How many in each quarter in that period?

This email is not intended to commemorate every commitment -- rather, just following up with this list specifically as we discussed.

Thanks!

Yours,

Remy.

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